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Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

October 14, 2015

WILLIAM M. MCCOOL, Clerk  
By A. Ellingson Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL G. HURLEY,

Defendant.

NO.

**CR15-336 JCC**

INDICTMENT

The Grand Jury charges that:

**COUNT 1**

**(Soliciting And Agreeing To Receive a Bribe By A Public Official)**

On or about September 11, 2015, at Seattle, in the Western District of Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly did corruptly demand, seek, and agree to receive and accept something of value personally, in return for being influenced in the performance of an official act, and being induced to do and omit any act in violation of his official duty; that is \$20,000 in connection with the conduct of his duties as an Internal Revenue Service ("IRS") Revenue Agent and assessment of taxes during the examination and audit of a taxpayer.

All in violation of Title 18, United States Code, Section 201(b)(2).

## COUNT 2

### (Receiving A Bribe By A Public Official)

On or about September 16, 2015, at Seattle, in the Western District of Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act, and being induced to do and omit any act in violation of his official duty; that is \$5,000 in connection with the conduct of his duties as an IRS Revenue Agent and assessment of taxes during the examination and audit of a taxpayer.

All in violation of Title 18, United States Code, Section 201(b)(2).

**COUNT 3**  
**(Receiving A Bribe By A Public Official)**

On or about September 21, 2015, at Seattle, in the Western District of Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act, and being induced to do and omit any act

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1 in violation of his official duty; that is \$15,000 in connection with the conduct of his  
2 duties as an IRS Revenue Agent and assessment of taxes during the examination and  
3 audit of a taxpayer.

4 All in violation of Title 18, United States Code, Section 201(b)(2).

5  
6 A TRUE BILL:  
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8 DATED: 10 - 14 - 15  
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10 [Signature of Foreperson redacted pursuant  
11 to the policy of the Judicial Conference of  
12 the United States]  
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14 \_\_\_\_\_  
15 *Lee Soren*  
16 ANNETTE L. HAYES  
17 \_\_\_\_\_  
18 ANDREW FRIEDMAN  
19 Assistant United States Attorney  
20 \_\_\_\_\_  
21 *ACF*  
22 JUSTIN W. ARNOLD  
23 Assistant United States Attorney  
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